



MEMO ENDORSED

A handwritten signature in black ink, appearing to read 'Valerie', is written over a horizontal line.

**HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE**

Dated: 5/22/25

May 21, 2025

Via ECF Filing

Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

The motion to seal is hereby GRANTED. The Clerk of Court is respectfully directed to maintain the viewing restrictions at ECF No. 79 and terminate the gavel at ECF No. 76

Re: *Escapex IP, LLC, v. Google, LLC*, Case No. 1:23-cv-10839-VSB –
Letter Motion to File Document Under Seal Regarding Violation of N.Y.R. Prof.
Conduct 4.2 Hearing

Dear Judge Figueredo:

Plaintiff, EscapeX IP, LLC files this Motion to Seal Plaintiff's Second Objections to Lawyer's Re-Redacted Time Records.

The document sought to be sealed contains the time records of Google's counsel which were filed under seal. (Doc. No. 74-1).

Therefore, EscapeX IP, LLC respectfully requests that this Court grant Plaintiff's Motion and seal the document filed as Second Objections to Lawyer's Re-Redacted Time Records.

Respectfully submitted,

/s/ William P. Ramey, III
William P. Ramey, III

CERTIFICATE OF CONFERENCE

William Ramey, counsel for Plaintiff, EscapeX IP, LLC, conferred with Jeff Barron of Barnes & Thornburg LLP, counsel for Google, by e-mail on May 21, 2025, regarding the filing of Plaintiff's Second Objections to Lawyer's Re-Redacted Time Records under seal, they are unopposed.

/s/ William P. Ramey, III
William P. Ramey, III

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served on this day of May 21, 2025, with a copy of the foregoing via e-mail and/or ECF Filing.

/s/ William P. Ramey, III
William P. Ramey, III